

Bonnie A. Freeman, Esq. (SB 180502)
SENNEFF FREEMAN & BLUESTONE, LLP
50 Old Courthouse Square, Suite 401
P.O. Box 3729
Santa Rosa, CA 95402-3729
Telephone: 707-526-4250
Facsimile: 707-526-0347

Attorneys for Defendant County of Sonoma

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

ROSEMARY JENSEN AND RANDY
JENSEN,

No. CV 08 3440 JCS (BZ)

Plaintiffs,

v.

COUNTY OF SONOMA,

Defendant.

**STIPULATION AND ORDER STAYING
COURT PROCEEDINGS AND
CONTINUING CASE MANAGEMENT
CONFERENCE OF 7/31/09; PROPOSED
ORDER THEREON**

Defendant County of Sonoma and Plaintiffs Rosemary Jensen and Randy Jensen, having participated in the Mandatory Settlement Conference before Hon. Bernard Zimmerman, make the following stipulations and request an Order from the Court as follows:

1. The parties participated in good faith in the settlement conference on March 5, 2009, and met again for further settlement conference on June 18, 2009. As a result, the parties have agreed to jointly seek a request that the Court continue to stay the court proceedings in light of the parties' agreement to further continue the Mandatory Settlement Conference with Magistrate Zimmerman to **August 14, 2009 at 9:00 a.m.**, a date confirmed by Magistrate Zimmerman by order filed June 19, 2009;

2. The parties agree to stay all pending discovery (not to re-open discovery), including expert discovery;

3. The parties jointly request that the currently scheduled Case Management Conference of July 31, 2009, at 1:30 p.m. be continued to a date within 30 days after the continued settlement

conference, the purpose of which would be to update the court with the parties' efforts at resolution and/or, alternatively, to obtain an updated pre-trial order from the Court. The parties would submit a Joint Case Management Conference statement 7 days' prior to the Case Management Conference.

DATED: July 2, 2009

SENNEFF FREEMAN & BLUESTONE, LLP

By: /s/ Bonnie A. Freeman-----
Bonnie A. Freeman
Attorneys for Defendant County of Sonoma

DATED: July 2, 2009

/s/ Frear Stephen Schmid-----
Frear Stephen Schmid, Attorney for Plaintiffs

ORDER

Good cause appearing, and pursuant to the stipulation above,

IT IS HEREBY ORDERED that the court proceedings and all discovery are stayed, pending the continued Mandatory Settlement Conference scheduled for August 14, 2009. The currently scheduled Case Management Conference of July 31, 2009 is VACATED. In the event that a dismissal of the case is not filed following the continued settlement conference, the case will be set for further Case Management Conference/Trial Setting Conference on September 18, 2009. The parties shall submit a joint Case Management Statement 7 days prior to the conference.

DATED: 7/9/09

JOSEPH C. SPERO
United States District Court
Northern District of California

